

# EXHIBIT 19

*Declaration of Leah Godesky*

In the Matter Of:

*FAIR ISAAC CORPORATION*

*vs*

*FEDERAL INSURANCE COMPANY, ET AL.*

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*TAMRA PAWLOSKI*

*January 18, 2019*

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HIGHLY CONFIDENTIAL

ATTORNEYS' EYES ONLY

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TAMRA PAWLOSKI - 01/18/2019

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1	how it was going to be used within the -- I	1	items to do next?
2	mean, there were diagrams that were done, and	2	A This was actually a
3	all of that, it was never -- we never talked	3	face-to-face, although it said "will not be on
4	about the consent part.	4	the phone," mike actually came to our office
5	And the salespeople were trying	5	for that meeting.
6	to sell us to other products.	6	And we presented how it was
7	Q I am handing you what has been	7	going to be used, what products it was going to
8	marked as Exhibit 253.	8	be used with, kind of like, I remember there
9	(The above described document was	9	being, Ramesh kind of did a whole big
10	marked Exhibit 253 for identification as	10	presentation on the white board, and then Mike
11	of this date.)	11	was going to take it back.
12	Q Have you seen this e-mail	12	Q And what was your recollection
13	before?	13	of how Blaze Advisor was going to be used by
14	A I have, yes.	14	the new company going forward?
15	Q At the very back there is an	15	A That it could not be used by,
16	e-mail dated February 2, 2016 from Henry	16	any of the applications by ACE, because ACE
17	Miolyuz to Mike Sawyer. Do you see that?	17	was -- the way that they underwrote would
18	A Yes.	18	not -- the Blaze product wouldn't be applicable
19	Q It's asking for Mike to copy	19	for it.
20	yourself on future correspondence with vendor	20	Q And so that was right away it
21	management?	21	was not going to be used?
22	A Yes.	22	A Right.
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1	Q Is that the time you began	1	Q Because the ACE platform was
2	taking over the discussions?	2	essentially just different than the Chubb
3	A It was.	3	platform, correct?
4	Q Regarding the future between	4	A That's correct.
5	Blaze Advisor and Chubb?	5	Q Did you talk about -- in that
6	A Yes.	6	conversation, was it stated that the use of
7	Q At the top of the e-mail it	7	Blaze Advisor would never be used by the legacy
8	references a meeting between you and Mike	8	ACE platforms?
9	Sawyer in early February. Did that meeting	9	A Yes.
10	occur?	10	Q So, at the time -- after the
11	A It did.	11	merger, after the merger up until you left,
12	Q What was your recollection from	12	were there any discussions about merging the
13	that meeting?	13	platforms used by legacy ACE and legacy Chubb?
14	A So myself and Ramesh Pandey were	14	A No. In fact, many of them were
15	in that meeting, and we were talking about the	15	being retired.
16	utilization of the software, and also talking	16	Q Many of?
17	about the new products, like how can we come to	17	A The applications were being
18	an agreement on all of this without involving	18	retired.
19	legal?	19	Q The --
20	Q And what conclusions did you	20	A Legacy Chubb.
21	arrive at during the phone call?	21	Q And what about the legacy ACE
22	Did you come up with any action	22	applications while you were still at Chubb,